



27 May 2003

Bill Pennington
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California Energy Commission
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sent via email: bpenning@energy.state.ca.us

re: Comments on February draft, Title 24 revision, Section 149 (b) 1.A.ii

Dear Mr. Pennington:

Comment

This subsection should be rewritten to clarify the intent of the CEC.

Rationale

On the face of it, this subsection adds nothing to the code. It can be read to require that all components must meet the requirements of 143(a), which is hardly an alternative to subsection (i) above it.

I believe that the intent of this subsection is to mirror the Overall Envelope Approach of 143(b). A suggested replacement might be something like:

Neither increase the overall heat gain nor increase the overall heat loss of the building envelope when compared to the case where all altered components individually meet the requirements of 143(a).

If you have any questions, please call me at (323) 908-5279.

Paul A. Beemer
Director, Legal & Technical Affairs
Henry Company

